

Our Code of Ethics
Doing What's Right



Why have a Code of Ethics?

Doing what's right means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work.

Our Code of Ethics sets out what we expect from every single person working for and with Vodafone. It also underlines our responsibilities to our people, partners and shareholders.

The Code of Ethics helps us all make informed decisions and tells us where to go for more information.

“Trust is fundamental to everything that we do.”

What is the Code of Ethics?

The Code of Ethics is our central policy document, outlining the requirements that every single person working for and with Vodafone must comply with, regardless of location. You may also have additional policies you need to adhere to that are specific to your role or your local market.


Who is the Code of Ethics for?

Our Code of Ethics is for everyone working for and with Vodafone: employees, directors, contractors, subsidiaries, joint ventures and suppliers. We expect our suppliers and business partners to uphold the same standards.

What are the consequences of not complying?

There are very serious consequences for not complying with our Code of Ethics. We take disciplinary action and even dismiss people where necessary.



A woman with long dark hair, wearing a red and white patterned dress, is sitting at a wooden table outdoors. She is holding a black smartphone to her ear with her right hand and looking at a black Samsung tablet with her left hand. On the table in front of her is a red tumbler with the Vodafone logo and the word "vodafone" printed on it. The background shows a red umbrella, green foliage, and a blue sky with white clouds. The text "Speak Up" is overlaid on the tablet.

Speak Up

Speak Up

If you see or hear behaviour at work which you feel may be a breach of our Code or seems illegal or unethical, please report it. You must report any behaviour which you suspect to be unlawful or criminal. This could be bribery, fraud, price fixing or a breach of data privacy.

You should also report abuse of our systems, processes or policies. This could be bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues. We have a non-retaliation policy when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if there is no proven unlawful conduct or compliance breach.

To make a confidential report about a break of the Code, email speakup@vodafone.co.ck

I am a contractor working on a Vodafone contract and I have a concern to report. Can I use speakup@vodafone.co.ck?

Yes. This email is dedicated for the use of employees and contractors as well as suppliers, business partners, joint venture partners and agents of Vodafone.

I have a concern about the actions of a colleague. How should I report this?

The most important thing is that you report your concern. Ultimately, it doesn't matter which route you choose. If you feel comfortable talking to your line manager, do that. Your line manager is there to support you and can help you choose the correct course of action.

I am concerned that my colleagues will find out if I raise a concern. Will it be kept confidential?

Protecting the identity of people who raise a concern in good faith is our priority. Vodafone will not tolerate retaliation against an employee who raises a genuine concern. We will keep what you tell us private and confidential throughout the investigation process, subject to our legal obligations.



Individual Conduct

1. We support and respect the protection of fundamental human rights and freedoms.
2. We have zero tolerance of discrimination.
3. We are honest in our business dealings.
4. We make decisions based on the facts.
5. We are respectful, courteous and kind to others.
6. We are accountable for our actions.
7. We look after Company property so that we get the best use out of it.
8. We report breaches of the Code.

Compliance with the Law

9. We obey the law.
10. We work against corruption in all its forms, including nepotism, extortion and bribery.
11. We don't do business with anyone that is associated with terrorism, money laundering or corruption.

Health & Safety

12. We strive to provide a healthy and safe workplace.
13. We do not tolerate harassment or bullying.
14. We forbid any type of slavery, trafficking, forced or coerced labour, or child labour.

Good Governance

15. We make decisions in the best interests of the Company.
16. We manage conflicts of interests transparently.
17. We have one of the world's most valuable brands. We protect this valuable asset by using it consistently.

Public Policy & Communications

18. We provide clear and honest information at all times and in a language that is easy to understand.
19. We don't get involved in politics.
20. We voice our opinions on Government proposals and other matters that may affect the Company and our stakeholders.

“We want to empower all of our employees to be good ambassadors for our brand.”



Financial Integrity

- 23. We keep accurate accounts that are available to external audit review.
- 24. We report the Company's performance to our shareholders and investors in an accurate and timely manner.
- 25. We pay the Company's taxes honestly and when due.

Business Continuity & Risk Management

- 26. We plan for the life of the business in good times and bad.
- 27. We proactively manage risks to the business.

Employees

- 28. We are an equal opportunity employer.
- 29. We encourage creativity and innovation from our employees.
- 30. We listen to our employees and their thoughts and opinions matter.
- 31. We empower all our employees to be good brand ambassadors for our brand.
- 32. We reward our employees for their performance.
- 33. We are there for each other in times of need.

Community & Society

- 34. We promote the Kia Orana Values.
- 35. We support community activities and initiatives.
- 36. We sponsor events and initiatives that will help the Cook Islands to prosper.
- 37. We want to connect people throughout the Cook Islands with each other and the world.

The Environment

- 38. We promote sustainable and environmentally friendly business practices.
- 39. We do our part to keep our Cook Islands paradise clean!

